

MARLEY SPOON

# **Modern Slavery Statement 2023**

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Marley Spoon acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders both past and present.

# Introduction

This is Marley Spoon Australia's fourth Modern Slavery Statement. It has been published in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**). It outlines our structure, operations and supply chains, and what we do to identify and address the risks that modern slavery potentially poses to our business and supply chains. This statement is made in respect of Calendar Year 2023.

People are the core of what we do at Marley Spoon. This means we take care of our customers and our team members. It also means we look out for the many others who help us in the pursuit of our mission – to build direct-to-consumer brands leveraging operational excellence to continuously delight our customers in a personalised and sustainable way. We are committed to achieving a global business environment that is free from exploitation and abuse of vulnerable people and recognise that, on our part, this means pursuing continuous improvement in our own processes for identifying and eliminating modern slavery risks.



## A Message From Our CEO

Marley Spoon Australia is proud to be a purpose-led business, with a strong set of values and principles that informs everything we do. We're guided by our values of entrepreneurship, enjoyment, integrity, ambition and teamwork – all of which are important when it comes to choosing the best suppliers and partners to work with throughout our supply chain.

Modern slavery unfortunately and sadly remains a reality for too many people around the globe and in some respects in Australia. We are determined to continually champion best practices and the highest standards with a mission to eliminate modern slavery in our supply chains and to drive positive change. We continue to seek to learn more about the root causes and illegal practices and seek more opportunities to address this fundamental issue with our own actions. One element of this is educating our team, for example with an internal training module. This module, which is available to all and compulsory for some team members, includes critical information on how to identify and stop modern slavery in supply chains, and emphasizing that modern slavery has no place at Marley Spoon.

We are committed to upholding fundamental human rights while supporting the wellbeing of all people involved with Marley Spoon – whether they are directly involved in our business operations or are members of the communities we serve – and will continue to work towards ending modern slavery.

*This statement was approved by the Board of Directors of MarleySpoon Pty Ltd on 14 March 2024.*

A handwritten signature in black ink, appearing to read "Rob Weber". The signature is fluid and cursive, with a large, sweeping flourish at the end.

**Managing Director**  
Marley Spoon Australia

March 2024

# Our Structure, Operations and Supply Chains

## STRUCTURE

MarleySpoon Pty Ltd (ACN 603 969 571) (**Marley Spoon Australia** or **the Company** or **we**) is a private company incorporated in Australia. It is a subsidiary of Marley Spoon SE, a company incorporated in Germany and listed on the Australian Securities Exchange (ASX: MMM), and which also owns subsidiaries in the European Union and the United States of America. During 2023, Marley Spoon Australia owned and controlled the entity Chefgood Pty Ltd (ACN 163 131 771), and the information contained in this statement also relates to that entity. The Company's registered office is located at Sydney Corporate Park, 190 Bourke Road, Alexandria NSW 2015. Marley Spoon Australia has operated business since 2015.

### Our Brands

We operate three key brands: Marley Spoon, Dinnerly and Chefgood:



**Marley Spoon**

Meal kit subscription service



**Dinnerly**

Meal kit subscription service



**Chefgood**

Ready-to-heat meal subscription service

Marley Spoon and Dinnerly are subscription-based weekly meal kit delivery services. A meal kit is a box, usually sent directly to a customer's home, which includes the required quantity of ingredients to cook two or more meals, along with step-by step recipe instructions. Chefgood is a subscription-based weekly ready-to-heat meal delivery service.

In June 2019, Marley Spoon entered into a five-year strategic partnership with Woolworths Group Limited, pursuant to which the parties collaborate on the promotion and marketing of the Marley Spoon and Dinnerly brands, growing these brands and their customers in the Australian market. In 2021, Marley Spoon commenced participation in Woolworths' Everyday Rewards loyalty program, allowing members of the program to earn Everyday Rewards points by making purchases through the Marley Spoon and Dinnerly websites.

## OPERATIONS

Our operations are located wholly within Australia and we serve customers across all eight states and territories. Ingredients are ordered from suppliers on an 'order to use' basis and delivered to one of our fulfillment centres, where they are picked and packed into boxes as final products in accordance with customer orders, then shipped directly to those customers. In the case of Chefgood, the ingredients are cooked on site. During 2023, we operated fulfillment centres located in Sydney, Melbourne and Perth.

Customers all over Australia receive their boxes on a weekly basis, usually directly to their homes. Marley Spoon Australia partners with delivery professionals to ensure the best possible delivery experience for customers. We employ approximately 666 team members in our operations on either a full time, part time, casual or contract basis.

## SUPPLY CHAIN

For each of our brands, we source high quality ingredients from a range of suppliers. The most important category of supply for us is food. We source a wide variety of edible products, including fruits, vegetables, meat, dairy and condiments. Marley Spoon Australia has an 'Australia first' sourcing policy; almost all of our direct suppliers are located in Australia, and the vast majority of our ingredients are sourced from an Australian origin. We are actively working towards increasing this percentage year over year by switching to Australian-made and grown products, as well as working with Australian-owned companies.

Through this approach, we ensure the highest standards of food quality and safety for our customers, maximising our contribution to the Australian economy at the same time. The vast majority of the food and other materials that we procure come from suppliers with which we have stable, long-term relationships. Having regard to availability, quality and cost, some of our suppliers also source some products internationally, which means that some elements of our products are also produced and packed outside of Australia, including Vietnam, Malaysia and the Netherlands. Countries listed on the Global Slavery Index which have a high prevalence of modern slavery were listed in our sustainability questionnaire in 2023 to increase the effectiveness of our risk-screening process.

## Identifying Risks

Most of our team members are employed directly, which lowers the risk of modern slavery practices occurring within our team. Our assessment of these risks is accordingly more focused on those parts of the business that use contracted labour and third-party service providers (which are kept at minimal levels). Workers in these areas may include permanent or temporary migrants, students and other persons who may be more vulnerable to exploitative labour practices. The use of labour hire agencies is strictly limited to registered providers which are compliant with Australian labour hire rules and regulations.

Whilst Australia is typically considered a relatively lower risk jurisdiction for modern slavery practices, Marley Spoon Australia recognises that being a purchaser of a wide variety of food products that are produced and packaged in Australia, modern slavery risks are also present in our domestic supply chains. In particular, the reliance of the agricultural industry on third party labour, temporary migrant workers, younger people, students and backpackers, often working on a casual or seasonal basis, gives rise to the risks of deceptive recruitment, forced labour and debt bondage. The risks in this area are greater, due to lower levels of literacy, education, experience, and knowledge of rights among such workers, as well as higher levels of reliance on the employer. We have identified that, within Australia, these are the risks that are most salient to our business.

The same types of risks, including child labour, may also be present in Marley Spoon's international supply chains.

# Addressing Risks

During the reporting period, Marley Spoon Australia used a range of tools and approaches to address the risk of modern slavery practices in our operations and supply chains. These tools and approaches, outlined below, are implemented through our policies, contracts and programs.

## BUILDING THE RIGHT CULTURE

In line with our values and our commitment to continuously delight our customers in a personalised and sustainable way, Marley Spoon is relentlessly focused on developing and maintaining an organisational culture which ensures that the way we deal with our stakeholders – including our team members, suppliers and partners – embodies the core values and commitments that we hold dear as a company; these are:

- ✓ **Sincerity** – We act boldly in an open, honest and responsible manner.
- ✓ **Determination** – We act decisively with a sense of urgency.
- ✓ **Passion** – We challenge the status quo with energy and enthusiasm.
- ✓ **Accountability** – We focus on outcomes and deliver on commitments and communicate internally and externally.
- ✓ **Integrity** – We treat others as we expect to be treated in attitude, communication and personal safety.
- ✓ **Diversity** – We are committed to a diverse and inclusive work environment, where everyone is treated fairly and with respect, regardless of gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation, sexual preference, language and other areas of potential difference.

These core values and commitments are expressed in our global Code of Conduct, to which all of our team members are required to adhere. The Code of Conduct also sets out the standards expected throughout the Company with respect to:

- ✓ Conflicts of interest
- ✓ Anti-bribery and gifts
- ✓ Privacy
- ✓ Fair dealing
- ✓ Discrimination, bullying, harassment and vilification
- ✓ Health and safety
- ✓ Compliance with laws and regulations

The Company's Whistleblower Policy also provides important means by which team members can call out what

may be breaches of the law, or of the standards we apply to ourselves and our stakeholders. All team members are encouraged to report any suspicion of wrongdoing, without fear of retaliation, and with the option of anonymity.

Whilst the Code of Conduct is not targeted specifically at addressing the risks of modern slavery, we consider that it is an integral part of our commitment to treating people with fairness and respect, and these values also underpin our commitment to a global business environment that is free of modern slavery practices.

Marley Spoon has a zero-tolerance policy with respect to any threat of physical or sexual violence, harassment or intimidation against employees and their families and close associates.

All Company policies are clearly defined and communicated to all employees.

## MODERN SLAVERY TRAINING

In 2021, Marley Spoon introduced an online modern slavery training module for team members. The module includes information about what modern slavery is, as well as how to best identify and report instances of it.

## SUSTAINABILITY MANAGER ROLE AND FRAMEWORK

The global Sustainability team, under the guidance of the Global Head of Sustainability, with the support of the The global Sustainability team, under the guidance of the Global Head of Sustainability, with the support of selected team members in Australia, direct the design, development, execution, and continuous improvement of our sustainability approach, goals, and initiatives, across our three pillars: Our Planet, Our People and Governance. In partnership with the global CEO, Executive Management, and other key teams in the Company, the Sustainability team ensures the completion of relevant training, audits and other measures to achieve transparency and reduce risks in the supply chain.

## EXTERNAL AUDITS

We engage expert workplace consultants to conduct independent audits of our compliance with the relevant Modern Award. These audits are based on a random sample of employees, and seek to identify any errors that may have been made with the remuneration and related

entitlements of employees. This ultimately helps us to ensure that all employees are properly compensated for their efforts. The Company is conscious of the inadvertent under-remuneration that has occurred in some Australian workplaces in recent years, and is committed to ensuring this does not happen at Marley Spoon Australia.

## **SUPPLIER ONBOARDING AND MONITORING**

At Marley Spoon Australia we work only with approved food and non-food vendors and items. This approval process is managed partly by way of supplier questionnaires and requests for information. Marley Spoon requires suppliers to complete a Modern Slavery Questionnaire. The results of this questionnaire are analysed to identify modern slavery risks that may exist in connection with any of our suppliers.

Marley Spoon Australia has continued to enhance its supplier onboarding and monitoring capabilities through our ongoing partnership with FoodsConnected, who provide a software portal-based supplier management tool, designed specifically for onboarding, auditing and monitoring suppliers. Through the use of this tool, we are achieving an approach to supplier onboarding and management that is more holistic, consistent, detailed and transparent, assisting us to manage supply processes from end to end.

## **INGREDIENT TRANSPARENCY**

We believe that enhancing supply chain transparency is an important part of the overall approach to minimizing modern slavery risks, enabling consumers to better understand the origins of our products. Through our Ingredient Hub, customers and members of the public can view the ingredients contained in each of our weekly recipes on a line-by-line basis including, for each individual ingredient, the percentage which has an Australian origin. The introduction of FoodsConnected also allows Marley Spoon to log the origin of each ingredient, providing another avenue to screen the risk of modern slavery in supply chains.

## **APM EMPLOYMENT SERVICES PARTNERSHIP**

For most job openings for casual roles, we collaborate with trusted providers of national job seeker programs in finding suitable matches. In 2022, Marley Spoon Australia commenced a partnership with APM, Australia's largest Disability Employment Services Provider, assisting individuals facing various forms of hardship in achieving productive participation in the economy. Through this partnership, Marley Spoon Australia has successfully onboarded several new team members, contributing to our commitment to ethical and inclusive employment practices.



# Assessing Effectiveness

Marley Spoon Australia is working to better understand the effects and efficacy of its actions to address modern slavery risks. We collect information and monitor the performance of the Company's various initiatives in the following ways:

- ✓ Tracking the results of our internal and external audits, and comparing these across time periods.
- ✓ Number and nature of issues raised through the whistleblower process and other grievance mechanisms.
- ✓ Percentage of team members who have received modern slavery training.
- ✓ Percentage of contracts requiring counterparties to comply with all applicable laws relating to modern slavery practices.

## Moving Forward

Modern slavery has no place in Marley Spoon's business or extended supply chains, or indeed in the broader business community. We have welcomed Australia's modern slavery reporting initiative, which we believe will play an important role in risk reduction. We are committed to a continuous improvement approach to ensure that we are not directly or indirectly acquiescing in unacceptable labour practices.

Assessing and addressing the risks of modern slavery is one aspect of the Marley Spoon Group's holistic approach to operating a sustainable business that benefits our stakeholders and the broader community. For further information relating to governance generally or the Group's approach to discharging its environmental, social and governance responsibilities, our latest Group Corporate Governance Statement and our Sustainability Report can be viewed online at:

<https://ir.marleyspoon.com/investor-centre/>.

